

1 Mark E. Merin (State Bar No. 043849)
2 Paul H. Masuhara (State Bar No. 289805)
3 **LAW OFFICE OF MARK E. MERIN**
4 1010 F Street, Suite 300
5 Sacramento, California 95814
Telephone: (916) 443-6911
Facsimile: (916) 447-8336
E-Mail: mark@markmerin.com
paul@markmerin.com

6 Attorneys for Plaintiffs
7 MYRAH MARTINEZ, KITARA MCCRAY,
MADISON MARLENE MARVEL, STAR SMITH,
8 and R.M.

9 Bonnie A. Freeman, Esq. (SB 180502)
10 SENNEFF FREEMAN & BLUESTONE, LLP
50 Old Courthouse Square, Suite 401
P.O. Box 3729
11 Santa Rosa, CA 95402-3729
Telephone: 707-526-4250
12 Facsimile: 707-526-0347
bfreeman@sennefflaw.com

13 Attorneys for Defendants County of Sonoma (also sued as Sonoma County Human Services Department
14 and Sonoma County Family, Youth and Children's Services), Jerry Dunn, Nick Honey and Stacie
15 Kabour

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN FRANCISCO DIVISION

19 MYRAH MARTINEZ, et al.,

Case No. 3:15-cv-01953-JST

20 Plaintiffs,

**STIPULATION TO CONTINUE JULY 23, 2015,
HEARING DATE; [PROPOSED] ORDER**

21 vs.

22 COUNTY OF SONOMA, et al.,

23 Defendants.

24 Defendants' motion to dismiss Plaintiffs' first amended complaint is currently scheduled for a
25 hearing before the Court on July 23, 2015. *See* ECF No. 19.

26 Plaintiff's counsel is unavailable to attend the hearing, as scheduled. Therefore, the parties hereby
27 agree and stipulate to continue the July 23, 2015, hearing date to July 30, 2015, or a date thereafter.

1 Dated: June 18, 2015

Respectfully Submitted,

2 LAW OFFICE OF MARK E. MERIN

3 /s/ Mark E. Merin

4 By: _____

5 Mark E. Merin

6 Attorneys for Plaintiffs

7 MYRAH MARTINEZ, KITARA MCCRAY,
MADISON MARLENE MARVEL, STAR SMITH,
and R.M.

8 Dated: June 18, 2015

9 Respectfully Submitted,

10 SENNEFF FREEMAN & BLUESTONE, LLP

11 /s/ Michael D. Senneff
(as authorized on June 18, 2015)

12 By: _____

13 Michael D. Senneff

14 Bonnie A. Freeman

15 Attorneys for Defendants County of Sonoma (also sued as
16 Sonoma County Human Services Department and Sonoma
17 County Family, Youth and Children's Services), Jerry
18 Dunn, Nick Honey and Stacie Kabour

19 **[PROPOSED] ORDER**

20 Pursuant to the parties' stipulation, the hearing on Defendants' motion to dismiss Plaintiffs' first
21 amended complaint (ECF No. 19) is hereby CONTINUED to July 30, 2015.

22 IT IS SO ORDERED.

23 Dated: June 18, 2015

